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January 28, 2020

The Honorable Vince Chhabria  
United States District Court  
San Francisco Courthouse  
Courtroom 4, 17<sup>th</sup> Floor  
450 Golden Gate Avenue  
San Francisco, CA 94102

**Re: *Vannucci, et al. v. County of Sonoma, et al.***  
**Case No. 18-CV-01955 (VC)**

Your Honor,

Pursuant to the Court's order yesterday, defendant City of Santa Rosa submits the following:

The City of Santa Rosa and the Santa Rosa Police Department are cognizant of the terms of the Preliminary Injunction issued on July 12, 2019 and their obligations under both the Injunction and the Ninth Circuit's decision in *Martin v. City of Boise*. The City and the Police Department have complied with and will continue to comply with both.

Regarding the anticipated closure by the County of the encampment on the County's Joe Rodota Trail, it is the City's understanding that the County has provided notice, engaged in outreach efforts and will, prior to enforcement, endeavor to comply with all notice, outreach, housing, and property storage obligations the County has under the injunction.

Regarding enforcement, it is our understanding that enforcement, including citations and/or arrests, will be undertaken by the Sonoma County Regional Park Rangers. The Santa Rosa Police Department's role shall be limited to providing security in the unlikely event of violence or a threat of violence toward a Park Ranger or others during their enforcement efforts and, when requested by a Ranger, to provide transport of an arrested individual to the County Jail. The Santa Rosa Police Department will not be issuing citations or effecting arrests and will assist in transportation only after confirmation by the Park Ranger requesting such transport that all pre-enforcement requirements under the Preliminary Injunction and the *Boise* decision have been met by the County.

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It is our sincere hope and expectation that our assistance will not be required by the County and that the closure will be successful, both in addressing this current health and safety crisis, and in providing those on the Trail with a successful path toward housing.

Respectfully submitted,

Very truly yours,



ROBERT L. JACKSON  
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RLJ:tk

cc : Melissa A. Morris, Esq.  
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